REMARKS

The Office Action dated October 22, 2008 have been received and carefully noted. The following remarks, are submitted as a full and complete response thereto.

Claims 12-26 are presently pending, of which claims 12, 22 and 25 are independent claims. Each of the presently pending claims 12-26 are presently pending and are respectfully submitted for reconsideration.

CLAIM REJECTIONS

Claims 12-26 were rejected under 35 U.S.C. §103(a) as being unpatentable over Rankin et al. (U.S. Patent No. 6,879,838) in view of Hasebe et al. (U.S. Patent No. 6,946,991). The Office Action took the position that all of the claimed subject matter recited in claims 12-26 is disclosed or suggested by Rankin and/or Hasebe. Specifically, the Office Action alleged that Rankin discloses a Cell ID is a parameter in the translation table which identifies the Cell ID as an estimated location parameter of the mobile station based on a coverage area of the base station, and where the translation table is used to match a corresponding prayer time to the Cell ID by matching the coverage area of the base station with at least one of the time of year and the time of day which are also parameters in at least one of the translation table and a lookup table. Applicant disagrees and submits that Rankin fails to disclose the above-noted features of the claims and Hasebe further fails to cure those deficiencies of Rankin. This rejection is respectfully traversed for at least the following reasons.

Applicant submits that Rankin does not teach or suggest "where <u>the estimated location of the mobile device</u> used to determine the at least one prayer time is based on

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the coverage area of the at least one base station **and** a current cell identification (Cell ID) parameter assigned to the mobile device" and "wherein said **Cell ID is a parameter in the translation table which identifies the Cell ID as an estimated location parameter of the mobile station based on the coverage area of the base station**, and where the translation table is used to match a corresponding prayer time to the Cell ID by matching the coverage area of the base station with at least one of the time of year and the time of day which are also parameters in at least one of the translation table and a look-up table", as recited, in part, in independent claim 12 and similarly in independent claim 22 and 25.

As noted above in the claim recitations of claim 12, a Cell ID parameter is used as a parameter that represents an estimated location of the mobile station and as a physical parameter in translation table. A Cell ID is well known to those having ordinary skill in the art as a unique number assigned to represent an individual cell (i.e., a cell of a GSM cellular network), which may also be assigned to a given operator.

In operation, a mobile station connected to a cell would know or at least have access to its respective Cell ID number, which, in turn, provides the mobile station with the knowledge of its corresponding base station and cell location. By knowing which cell the mobile station is operating under, the mobile station can be identified as being located within an estimated location of the cell's active coverage area. Simply knowing which Cell ID parameter is assigned to the mobile station and that the mobile station is actively communicating with the cell, the mobile station's position can be estimated as being somewhere in the vicinity of the cell's coverage area. A cell may generally be anywhere between several hundreds meters and several kilometers, thus putting the mobile station's estimated location as being anywhere within the cell's physical limits.

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As noted above in the claim recitations of claim 12, the Cell ID is a parameter in a table and is identified as an estimated location of the mobile station. Claim 12 further identifies that the location of the mobile station is based on the coverage area of the base station. Using a Cell ID-based location scheme to identify the location of the mobile station is not disclosed in Rankin. The entire contents of Rankin's disclosure are directed to using GPS or time of arrival-based location algorithms. In fact, GPS provides a more detailed and precise estimate of the location of a mobile station than a Cell ID based location scheme. The important distinction is that GPS and Cell ID-based mobile station location schemes are <u>not</u> the same (emphasis added). GPS estimates coordinates of the mobile station itself, whereas the Cell ID-based location scheme simply refers to a Cell ID assigned to the mobile station.

Referring to the Office Action, page 4, lines 10-12 alleged that Rankin discloses "where the estimated location of the mobile device used to determine the at least one prayer time is based on the coverage area of the at least one base station and a current cell identification (Cell ID) parameter assigned to the mobile device", as recited in claim 12 and similarly in independent claims 22 and 25, and relied on columns 3-6 of Rankin for support. Applicant strongly disagrees and submits that the following detailed analysis of columns 3-6 of Rankin will demonstrate the lack of support for the above-noted feature of claim 12.

Referring to column 3, lines 33-48 of Rankin, a time difference of arrival (TDOA) algorithm is used to determine the location of the mobile communications device 100 (see column 3, lines 35-40 of Rankin). TDOA implements a triangulation algorithm that is based on power signals measured between at least two base stations and the

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communications device 100. The estimated power signals are normalized based on the at least two base stations to provide an estimated location of the communications device 100. Rankin then proceeds to describe the advent of a self-equipped GPS location estimation technique (see column 3, lines 40-45 of Rankin) used to estimate the location of the mobile communications device 100. Clearly, neither of these techniques use the Cell ID parameter of the mobile communications device, and, certainly, not the Cell ID parameter itself to demonstrate a location estimate of the mobile communications devices.

Referring to column 4, line 12 through column 5, line 12 of Rankin (an entire page of Rankin's disclosure), GPS and TDOA are again described as tools used to locate the position of the mobile communications device 100. An example is given which describes the precision of location as being +/- 10 meters. Contrary to this measuring technique of Rankin, claim 12 recites "determining an estimated location of the mobile device, within a precision of a coverage area of at least one base station by employing a location technology algorithm." A base station in its smallest form goes beyond 10 meters worth of coverage, and, thus, the GPS location estimate of Rankin is far more precise than the simple precision of a coverage area of at least one base station, as recited in the pending claims.

Further regarding column 4 of Rankin, once a location estimate has been obtained, a location resource server 103 provides an electronic map of location-based information services to the device 100. The server 103 maps locations (based on geographical estimates from GPS or TDOA) to services near the locations (see column 4, lines 45-49). There is no reference in Rankin of mapping of cell IDs to any location services.

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Referring to column 5 of Rankin, examples are disclosed which include providing information to the users based on the time of day, user preferences, and which also include using maps having nearby service information. Column 6 of Rankin provides more detailed examples of the types of maps sent to the user communications device 100. For example, maps may include local bus timetables, airport boarding information etc. (see column 6, lines 40-47 of Rankin). As noted above, none of the location-specific information provided to the mobile communications device 100 is based on a Cell ID of the cell of the communications device. If Rankin were to rely solely on a Cell ID location algorithm the precision required by Rankin would not be met and the location services map would fail for being to vast and inaccurate.

The Office Action's allegation that Rankin discloses "where the estimated location of the mobile device used to determine the at least one prayer time is based on the coverage area of the at least one base station and a current cell identification (Cell ID) parameter assigned to the mobile device", as recited in claim 12 and similarly in independent claims 22 and 25 is without merit because Rankin does not disclose a Cell ID based location scheme. Rankin is using GPS and TDOA to determine as precise a location as possible for the mobile communications device 100 so that user preferences and nearby services can be matched and accurately forwarded to the mobile communications device 100. The present application instead simply discloses a cell ID as an estimate to provide a prayer time based on a larger less precise region. The Azaan neighborhood used in muslim prayers does not require as much precision as a local service store (i.e., a restaurant (see column 7, line 1 of Rankin)).

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The Office Action further alleged that the "Cell ID is a parameter in the translation table which identifies the Cell ID as an estimated location parameter of the mobile station based on the coverage area of the mobile station." **Applicants submit that Rankin does not disclose a Cell ID anywhere in its disclosure** (emphasis added). The fact that the claims recite "said Cell ID is a parameter in the translation table...", and Rankin does not disclose a "Cell ID", serves as evidence that Rankin does not disclose the alleged features of the claims. Aside from the lack of an express teaching of a Cell ID, Rankin also does not even hint or suggest that a Cell ID-based location scheme would be appropriate because the precision required for the GPS and TDOA location schemes disclosed in Rankin would require even more accuracy to provide exact locations of services, such as, restaurants and bus stops.

In support of the allegation that Rankin discloses "wherein said Cell ID is a parameter in the translation table which identifies the Cell ID as an estimated location parameter of the mobile station based on the coverage area of the base station, and where the translation table is used to match a corresponding prayer time to the Cell ID by matching the coverage area of the base station with at least one of the time of year and the time of day which are also parameters in at least one of the translation table and a look-up table", as recited in independent claim 12, 22 and 25, the Office Action relied on column 4, lines 12-34 of Rankin, Applicant submits that column 4 of Rankin is silent regarding these features of the pending claims.

As noted above, column 4 of Rankin discloses that GPS and TDOA are tools used to locate the position of the mobile communications device 100. An example is given which describes the precision of location as being +/- 10 meters. Further regarding

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column 4 of Rankin, once a location estimate has been obtained, a location resource server 103 provides an electronic map of location based information services to the device 100. The server 103 maps locations (based on geographical estimates from GPS or TDOA) to services near the locations (see column 4, lines 45-49). There is no reference in Rankin of any mapping of Cell IDs to any location services.

In addition to the above-noted deficiencies of Rankin, Hasebe does not cure those deficiencies with respect to any of claims 12-26. Hasebe discloses a device that helps determine when to pray and what direction to face when praying (see FIG. 3 of Hasebe). Hasebe discloses a religious service time table that uses location information via GPS and position information via a compass (see column 1, lines 44-46 of Hasebe). Column 3, line 33 and lines 55-60 of Hasebe make it clear that Hasebe is limited to GPS to determine when and what direction to use when praying. Hasebe does not rely on any cellular-related features, such as, a cell ID to estimate a location of a mobile station, and, to implement a cellular parameter in a translation table for determining a prayer time. Similarly to Rankin, Hasebe is silent regarding the use of a cell ID parameter.

Therefore, neither Rankin nor Hasebe discloses "wherein said Cell ID is a parameter in the translation table which identifies the Cell ID as an estimated location parameter of the mobile station based on the coverage area of the base station, and where the translation table is used to match a corresponding prayer time to the Cell ID by matching the coverage area of the base station with at least one of the time of year and the time of day which are also parameters in at least one of the translation table and a look-up table", as recited in independent claim 12, 22 and 25.

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Therefore, Applicants submit that the subject matter recited in independent claims 12, 22 and 25, and by virtue of dependency, those claims dependent thereon, clearly recite subject matter that is not taught by Rankin or Hasebe. A *prima facie* case of obviousness under 35 U.S.C. §103(a) has not been established, and, thus, the rejection must be withdrawn. Each of the pending claims 12-26 are condition for allowance. The withdrawal of all outstanding rejections and an allowance of all outstanding claims 12-26 are respectfully requested.

In view of the above, Applicant respectfully submits that each of the pending claim recites subject matter which is neither disclosed nor suggested in the cited art. It is therefore respectfully requested that the rejections of claims 12-26 be withdrawn, and this application passed to issue.

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If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

With best regards,

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